Mr. Oliver D. Kingsley, President Exelon Nuclear Exelon Generation Company, LLC 200 Exelon Way, KSA 3-E Kennett Square, PA 19348

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION - NRC INSPECTION REPORT

50-277/01-05, 50-278/01-05 AND 07201027/01-05

Dear Mr. Kingsley:

On June 30, 2001, the NRC completed an inspection at the Peach Bottom Atomic Power Station. The enclosed report documents the inspection findings which were discussed on July 11, 2001, with Mr. Jay Doering and other members of your staff.

This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings of significance were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

If you have any questions, please contact me at 610-337-5209.

Sincerely,

/RA/

Joseph G. Schoppy Jr., Acting Chief Projects Branch 4 Division of Reactor Projects

Docket Nos.: 50-277, 50-278, 07201027

License Nos.: DPR-44, DPR-56

Enclosure: Inspection Report No. 50-277/01-05, 50-278/01-05 and 07201027/01-05

Attachment 1 - Supplemental Information

cc w/encl:

- J. Hagan, Senior Vice President, Exelon Generation Company, LLC
- J. Cotton, Senior Vice President, Operations Support
- W. Bohlke, Senior Vice President, Nuclear Services
- J. Skolds, Chief Operating Officer
- J. Doering, Vice President, Peach Bottom Atomic Power Station
- G. Johnston, Plant Manager, Peach Bottom Atomic Power Station
- J. A. Benjamin, Vice President Licensing and Regulatory Affairs
- J. A. Hutton, Director, Licensing, Exelon Generation Company, LLC
- G. Hunger, Chairman, Nuclear Review Board
- P. Chabot, Director, Nuclear Oversight
- A. F. Kirby, III, External Operations Delmarva Power & Light Co.
- A. A. Winter, Manager, Experience Assessment
- J. W. Durham, Sr., Senior Vice President and General Counsel
- H. C. Kresge, Manager, External Operations, Connectiv
- N. J. Sproul, Manager, Financial Control & Co-Owner Affairs, Connectiv
- R. McLean, Power Plant Siting, Nuclear Evaluations
- D. Levin, Acting Secretary of Harford County Council
- R. Ochs, Maryland Safe Energy Coalition
- J. H. Walter, Chief Engineer, Public Service Commission of Maryland
- Mr. & Mrs. Dennis Hiebert, Peach Bottom Alliance
- Mr. & Mrs. Kip Adams

Chief, Division of Nuclear Safety

E. Cullen, Vice President, General Counsel

Correspondence Control Desk

Commonwealth of Pennsylvania

State of Maryland

TMI - Alert (TMIA)

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U. S. NUCLEAR REGULATORY COMMISSION REGION I

Docket Nos:	50-277	
	E0 070	

50-278 07201027

License Nos: DPR-44

DPR-56

Report Nos: 50-277/01-05

50-278/01-05 07201027/01-05

Licensee: Exelon Generation Company, LLC

Correspondence Control Desk 200 Exelon Way, KSA 1-N-1 Kennett Square, PA 19348

Facility: Peach Bottom Atomic Power Station Units 2 and 3

Inspection Period: May 20, 2001 through June 30, 2001

Inspectors: A. McMurtray, Senior Resident Inspector

M. Buckley, Resident Inspector

R. Nimitz, Senior Radiation Specialist

T. Burns, Reactor Inspector

S. Chaudhary, Senior Reactor Engineer

Approved by: Joseph G. Schoppy Jr., Acting Chief

Projects Branch 4

Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000277/2001-005, 05000278/2001-005, and 07201027/2001-005 on 05/20/01-06/30/01; Exelon Generation Company; Peach Bottom Atomic Power Station; Units 2&3. Integrated Report.

The report was conducted by resident inspectors, a senior radiation specialist, a reactor inspector, and a senior reactor engineer. The inspection identified no findings of significance.

The significance of most findings is indicated by the color (Green, White, Yellow, Red) using Inspection Manual Chapter 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply are indicated by "no color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.

A. Inspector Identified Findings

No findings of significance were identified.

B. Licensee Identified Findings

The inspectors reviewed two violations of very low significance which were identified by Exelon. Corrective actions, taken or planned by Exelon, appeared reasonable. These violations are described in Section 4OA7 of this report.

Report Details

SUMMARY OF PLANT STATUS

UNIT 2

Unit 2 began this inspection period at 100 percent power. On June 30, 2001, operators commenced an unplanned power reduction to approximately 63 percent to allow repair of an electro-hydraulic control system leak at a servo on the No. 2 main turbine control valve. Later that same day, operators returned the unit to 100 percent power.

UNIT 3

Unit 3 began this inspection period at 100 percent power. On May 29, 2001, the fifth stage feed water heaters were removed from service for end-of cycle coastdown. Unit 3 ended the inspection period at approximately 98 percent power with the fourth stage feedwater heaters removed from service.

1. REACTOR SAFETY

Initiating Events, Mitigating Systems, Barrier Integrity [REACTOR-R]

1R01 Adverse Weather Protection

a. Inspection Scope

The inspectors reviewed Exelon's preparations for hot weather conditions and walked down selected systems that could be affected by high temperatures to verify that these systems would remain functional during hot weather conditions. The inspectors used RT-O-040-610-2, Rev 7, "Outbuilding Heating, Ventilation, and Air Conditioning and Equipment Inspection for Summer Operation" during this inspection.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment

a. <u>Inspection Scope</u>

The inspectors performed partial system walkdowns to verify system and component alignment and note any discrepancies that would impact system operability. The inspectors verified selected portions of redundant or backup systems/trains were available while a system was out of service. The inspectors reviewed selected valve positions, electrical power availability, and the general condition of major system components. The walkdowns included the following systems:

- 'B' standby gas treatment system (SBGT) during planned maintenance on 'A' SBGT
- E2,3,4 emergency diesel generators (EDG) prior to and during a maintenance outage on the E1 EDG

Auxiliary power distribution breaker alignment after loss of 343 startup bus

b. <u>Findings</u>

No findings of significance were identified.

1R05 <u>Fire Protection</u>

a. <u>Inspection Scope</u>

The inspectors reviewed the Fire Protection Plan and Technical Requirements Manuals to determine the required fire protection design features, fire area boundaries, and combustible loading requirements for the areas examined during this inspection. The inspectors then performed walkdowns of these areas to assess control of transient combustible material and ignition sources, fire detection and suppression capabilities, fire barriers, and any related compensatory measures. The areas included:

- Emergency diesel generator's building, including the E1 through E4 diesel rooms, cardox room, and ventilation rooms
- Unit 2 battery rooms
- Unit 2 emergency switchgear rooms
- Unit 2 recirculation pumps motor/generator rooms
- Unit 3 battery rooms
- Unit 3 emergency switchgear rooms
- Unit 3 recirculation pumps motor/generator rooms

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification

a. <u>Inspection Scope</u>

On June 18, 2001, the inspectors observed licensed operator performance during Licensed Operator Requalification Training Cycle 00-08 and the evaluator's critique of the operators' performance. The inspectors focused on the satisfactory completion of crew critical tasks. Critical tasks are limits placed on key reactor plant parameters that will ensure safety margins are maintained during the simulated malfunctions. Also, the inspectors reviewed the operators' adherence to Technical Specifications (TSs), emergency plan implementation, and the use of emergency operating procedures.

b. <u>Findings</u>

No findings of significance were identified.

1R12 Maintenance Rule Implementation

.1 Maintenance Effectiveness

a. <u>Inspection Scope</u>

The inspectors reviewed the follow-up actions for issues identified on several systems, structures, or components (SSCs) and the performance of these SSCs, to assess the effectiveness of Exelon's maintenance activities. The inspectors verified that problem identification and resolution of these issues had been appropriately monitored, evaluated, and dispositioned in accordance with Exelon's procedures and the requirements of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance." In addition, the inspectors reviewed selected SSC classification, performance criteria and goals, and corrective actions to verify that the actions were reasonable and appropriate. For identified issues, the inspectors reviewed the following systems and documents:

Systems

- Emergency service water (ESW) system
- Unit 2 high pressure coolant injection (HPCI) system
- Public address/site evacuation system
- Unit 3 reactor pressure vessel and internals

Procedures and Documents

- Peach Bottom Maintenance Rule Bases Documentation
- Performance Evaluation Process (PEP) (I0010451, I0010133, I0011145, I0012537, and I0012604)
- System Health Overview Reports
- Action Requests (A1172004, A1304876, A1198189, A1239491, A1262176, and A1314848)

b. Findings

No findings of significance were identified.

.2 Periodic Evaluations

a. <u>Inspection Scope</u>

The inspectors reviewed the periodic evaluations required by 10 CFR 50.65 (a)(3) for Peach Bottom Station, Units 2 & 3 to verify that SSCs within the scope of the maintenance rule were included in the evaluations and balancing of reliability and unavailability was given adequate consideration. The inspectors reviewed Exelon's most recent periodic evaluation reports, covering the period October 1997 through September 1999.

The inspectors selected the safety significant systems that were in (a)(1) status to verify that: (1) goals and performance criteria were appropriate, (2) industry operating experience was considered, (3) corrective action plans were effective, and (4) performance was being effectively monitored. As of June 25, 2001, there were nine SSCs in (a)(1) status, out of which seven were risk significant systems. These nine

systems were in various stages of evaluation, monitoring and corrective action. The inspectors also reviewed Exelon's assessment of the balance between reliability and availability for these systems.

The inspectors selected the following (a)(1) systems for detailed review:

- Vessel instrumentation (Units 2 & 3) 510 Rosemont trip units
- Vessel instrumentation (Units 2 & 3) Rockwell gland flanges
- Unit 3 feed water
- Unit 3 reactor pressure vessel internals
- 480V NEMA size 3 starters
- Unit 2 HPCI
- Unit 2 primary containment

Additionally, status and documentation for the following systems were also reviewed:

- Unit 2 main stack rad monitor
- Seismic monitoring

The inspector reviewed the System Health Overview Report for the following (a)(2) high safety significant systems to verify that performance was acceptable:

- SBGT system
- EDGs and EDG building heating, ventilation and air conditioning
- Residual heat removal (RHR) (Units 2 & 3)
- Standby liquid control (Units 2 & 3)
- ESW

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation

a. <u>Inspection Scope</u>

The inspectors reviewed risk evaluations and contingency plans for selected planned and emergent work activities to verify that appropriate risk evaluations were performed and to assess Exelon's management of overall plant risk. The inspectors compared the risk assessments and risk management actions against the requirements of 10 CFR 50.65(a)(4) and the recommendations of NUMARC 93-01 Section 11, "Assessment of Risk Resulting from Performance of Maintenance Activities." The inspectors verified that risk assessments were performed when required and appropriate risk management actions were identified.

The inspectors attended planning meetings and discussed the risk management of the activities with operators, maintenance personnel, system engineers, and work coordinators to verify that risk management action thresholds were identified correctly.

The inspectors also verified that appropriate implementation of risk management actions were performed in accordance with Exelon procedures for the following activities:

- Unit 2 'C' feedwater flow transmitter replacement on-line
- Unit 2 HPCI testing with high pressure service water (HPSW) pump out of service for scheduled maintenance
- Work rescheduling after discovery of a Unit 2 reactor water cleanup leak and isolation
- 'A' SBGT damper maintenance during the E1 EDG maintenance outage

In addition, the inspectors reviewed the assessed risk configurations against the actual plant conditions and any in-progress evolutions or external events to verify that the assessments were accurate, complete, and appropriate for the issues. The inspectors performed control room and field walkdowns to verify that compensatory measures identified by the risk assessments were appropriately performed. The specific plant configurations included:

- Verified that the Unit 2 'C' feedwater transmitter was replaced.
- Verified that the fire protection system was included in the configuration controls for the maintenance activities for the 'A' SBGT train.

b. <u>Findings</u>

No findings of significance were identified.

1R14 <u>Personnel Performance During Non-Routine Plant Evolutions</u>

a. Inspection Scope

The inspectors reviewed plant computer and recorder data, operator logs and approved procedures, and observed control room operators while evaluating the performance of operations personnel in response to the following non-routine evolutions:

- Unit 2 reactor water cleanup system leak and isolation (5/21/2001)
- Loss of the 343 off-site startup power source (6/18/2001)
- Severe thunderstorm response, including the loss of the main stack radiation monitors and the Unit 2 hydrogen water chemistry system (6/29/2001)

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed operability evaluations to assess the adequacy of the evaluations, the use and control of compensatory measures, compliance with the TSs, and the risk significance of the issues. The inspectors verified that the operability

determinations were performed in accordance with NOM-C-11.1, Rev. 1, "Operability" and A-C-901, Rev. 10, "Control of Nonconformances." The inspectors used the TSs, Technical Requirements Manuals, the Updated Final Safety Analysis Report (UFSAR), the Peach Bottom Radioactive Effluent Release Report No. 43 for Calendar Year 2000 and associated Design Basis Documents as references during these reviews. The issues reviewed included:

- 'A' SBGT after maintenance with the heater jumpered out of service
- Unit 2 HPSW piping section in the 'D' RHR room below minimum wall thickness
- E1 EDG injector leaks during post maintenance testing
- Unit 2 HPSW high radiation alarm during the 2 'C' HPSW pump run
- Unit 2 'B' train of HPSW/ESW ventilation system out of service
- HPCI minimum flow valve (MO-3-23-025-OP) short stroke time during in-service testing
- Unit 2 'A' outboard main steam isolation valve packing leak

b. Findings

No findings of significance were identified.

1R16 Operator Work-Arounds

a. <u>Inspection Scope</u>

The inspectors reviewed the process used by operations personnel to track and report operator workarounds and challenges to plant management. The inspectors verified that Peach Bottom personnel had identified degraded or non-conforming conditions, which would complicate the operation of plant equipment and would be compensated for by operator action. The inspectors also verified that these conditions had been identified at the appropriate threshold and had been incorporated into the corrective action program.

b. <u>Findings</u>

No findings of significance were identified.

1R19 Post-Maintenance Testing

a. <u>Inspection Scope</u>

The inspectors observed portions of post-maintenance testing activities and reviewed selected test data. The inspectors assessed the adequacy of the test methodology based on the scope of maintenance work performed and the acceptance criteria to demonstrate that the tested components satisfied the design and licensing bases and TS requirements. The specific tests reviewed included:

- SBGT testing after planned maintenance (ST-O-09A-230-2 Rev. 4, "SBGT System Filter Differential and Heater Capacity")
- Testing E1 EDG after the diesel maintenance outage (RT-O-052-251-2 Rev. 7, "E1 Diesel Generator Inspections Post-Maintenance Functional Test" and ST-O-052-411-2 Rev. 12."E1 Diesel Generator Fast Start and Full Lead Test")

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing

a. <u>Inspection Scope</u>

The inspectors reviewed and observed portions of the following surveillance tests, and compared test data with established acceptance criteria to verify the systems demonstrated the capability of performing the intended safety functions. The inspectors also verified that the systems and components maintained operational readiness, met applicable TS requirements, and were capable of performing the design basis functions. The observed or reviewed surveillance tests included:

- Unit 2 HPCI Pump, Valve, Flow and Unit Cooler Functional and In-service Test (ST-O-023-301-2, Rev. 26)
- Unit 3 HPCI Pump, Valve, Flow and Unit Cooler Functional and In-Service Test (ST-O-023-310-3, Rev. 27)
- Station Blackout Line Loading Verification (RT-O-51H-900-2, Rev. 3)

b. Findings

No findings of significance were identified.

1R23 <u>Temporary Plant Modifications</u>

a. Inspection Scope

The inspectors reviewed the temporary plant modifications that supported continued operability of the systems or components listed below. These reviews were performed to determine whether the temporary changes adversely affected system or support system availability, or adversely affected a function important to plant safety. The

inspectors reviewed the associated system design bases, including the UFSAR and TSs, and assessed the adequacy of the 10 CFR 50.59 safety evaluation screenings. The inspectors also assessed configuration control of the temporary changes by reviewing selected drawings and procedures to verify that appropriate updates had been made and in compliance with Exelon's procedure, "Temporary Plant Alternations (TPA)," MOD-C-7, Rev. 6. The inspectors compared the actual installations against the temporary modification documents to verify that the implemented changes were consistent with the approved documents. The inspectors reviewed selected post-installation tests results to confirm that the actual impact of the temporary changes had been adequately verified by test. The following temporary modifications and documents were included in the review:

Temporary Modifications

- 'A' SBGT heater element jumpered out-of-service (ECR PB 99-02017)
- Unit 2 reactor water cleanup suction relief valve replacement with a blank flange (ECR PB 01-00591)

Procedures and Documents

- Engineering Change Request (ECR) PB 01-00591
- Action Reguests (A1322185, A1321792, and A1321073)
- Worthington Corporation Pump Test Data (E-196146)
- Engineering Calculations (12-19,12-20, SP-31, and SP-33)
- Engineering Change Request A1229404
- Performance Evaluation Process Document I0012657
- Work Order R0737832
- Design Basis Document P-S-32 "Standby Gas Treatment"

b. Findings

No findings of significance were identified.

Emergency Preparedness [EP]

1EP6 <u>Drill Evaluation</u>

a. <u>Inspection Scope</u>

The inspectors observed a full participation emergency preparedness drill conducted by Exelon on June 25, 2001. The inspectors focused on the performance of risk significant evolutions by site personnel in the technical support center. These risk significant evolutions included emergency classification, offsite notification, radiological assessment, and coordination with the emergency operations facility to issue the protective action recommendations. The inspectors also evaluated the emergency response organization's recognition of abnormal conditions, command and control, communications, utilization of repair and field monitoring teams, and the overall implementation of the emergency plan. The inspectors observed Exelon's drill critique

and verified that any weaknesses or deficiencies observed during the drill were discussed and evaluated during the critique.

b. <u>Findings</u>

No findings of significance were identified.

2. RADIATION SAFETY

Occupational Radiation Safety [OS]

2OS1 Access Control To Radiologically Significant Areas

a. <u>Inspection Scope</u>

The inspectors conducted the following activities and reviewed the following documents to determine the effectiveness of access controls to radiologically significant areas:

- The inspectors discussed procedure changes for administrative procedures providing requirements for access to High and Very High Radiation Areas to ensure no degradation in access controls had occurred.
- The inspectors made independent radiation measurements of radiation levels within accessible radiologically controlled areas at the station to: 1) verify that areas expected to exhibit radiation levels in excess of 100 mR/hr were properly posted and controlled as High Radiation Areas, in accordance with applicable requirements and 2) to confirm that radiation dose rates were consistent with survey data. The inspectors verified that three locked High Radiation doors were properly secured.
- The radiological source term was evaluated to ensure radiological dose assessments were properly performed including dose assessment for potential transuranic radionuclides.

The reviews in this area were against applicable requirements contained in 10 CFR Part 20, applicable Exelon procedures and TSs, and Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants," June 1993.

b. Findings

No findings of significance were identified.

2OS3 Radiation Monitoring Instrumentation

a. Inspection Scope

The inspectors selectively reviewed elements of the radiation survey and monitoring instrumentation program to determine the accuracy and operability of radiation monitoring instruments used for the protection of occupational workers. The inspectors sampled and reviewed calibration and response check data, as appropriate, for fixed area radiation monitoring systems, portable air monitoring systems, portable radiation survey instrumentation (beta, gamma, neutron, and underwater survey), laboratory counting instruments (beta, gamma, alpha), electronic dosimetry, personnel contamination monitoring systems including whole body contamination monitors, and a whole body counting system used for determination of intakes of radioactive materials. The inspectors verified that calibrations were conducted using appropriate standards, radiation types were appropriate for the calibration, irradiators were properly calibrated, and operability checks were performed. The inspectors toured calibration facilities and observed personnel conducting instrument operability checks. The inspectors reviewed National Voluntary Laboratory Accreditation Program results (February 22, 2000) for in use personnel monitoring devices. The following instrumentation was reviewed:

Laboratory Instrumentation

- SAC 4 No. 727
- BC-4 Nos. 518 and 764

The inspectors observed source checking for operability of Nos. 727 and 518.

Portable Instrumentation

- RM-14 No. 7586, 7868
- RO-2A Nos. 3598 and 3462
- Bicron Nos. 333031 and 681
- Delta 5 Nos. 304 and 33346
- ASP -1 2420
- AM-2 333689
- AMP 100 No. 5098036
- Telepole- 6698020
- RO-7 No. 826
- PDE-4 No. 991743
- MGP No. 669805
- RADOS Electronic dosimeters (sampled 30)

Air sampling/test equipment

- Hi vol No. 6440
- Hastings No. 211491
- Gillian No. 211435
- AMS-4 334570, 334635

Wholebody friskers/counters

- FastScan 96-5997 (calibration report dated April 10, 2001)
- PM-7 No. 244

PMW 950827

Fixed Plant instrumentation

- Area radiation monitors 6-10, 7-12, 2-1, 3-8, 4-5
- High range containment monitors
- U-3 SI-3R-63G-5132-XXCQ February 2001
- U-2 ST-C-095-868-2 September 2000

The inspectors also reviewed the status and surveillance testing of self-contained breathing apparatus' (SCBAs) (Nos. 16, 88, 213, 319, 459) positioned in the control room and the operations support center, to ascertain the availability and readiness of the equipment. The inspectors reviewed procedure RT-H-099-990-2, "Scott Air-Pak and Bottle Inspection," Rev.4, and the status of control room personnel SCBA training including training on changing of cylinders.

The inspectors also reviewed recent self-assessments of the instrument calibration program and data contained within the corrective action program (PEP documents 10012342, 10012345, 10012197, 10012126, and 10012689) including internal dose assessments.

The inspectors' reviews in the above areas were against criteria contained in 10 CFR 20, applicable station procedures, applicable national standards, the UFSAR, and applicable regulatory guides.

b. <u>Findings</u>

No findings of significance were identified.

4. OTHER ACTIVITIES [OA]

4OA1 Performance Indicator Verification

a. Inspection Scope

The inspectors reviewed Exelon's records to assess the accuracy and completeness of selected NRC performance indicator data. The records reviewed included selected TS limiting condition for operation logs, system surveillance tests, licensee event reports, and condition reports. The specific indicators included:

- Unit 2 Unplanned Scrams per 7000 Critical Hours (Initiating Events Cornerstone)
- Unit 3 Unplanned Scrams per 7000 Critical Hours (Initiating Events Cornerstone)
- Unit 2 Scrams with Loss of Normal Heat Removal (Initiating Events Cornerstone)
- Unit 3 Scrams with Loss of Normal Heat Removal (Initiating Events Cornerstone)
- Unit 2 Transients per 7000Critical Hours (Initiating Events Cornerstone)
- Unit 3 Transients per 7000Critical Hours (Initiating Events Cornerstone)
- Unit 2 Reactor Coolant System Specific Activity (Barrier Integrity Cornerstone)
- Unit 3 Reactor Coolant System Specific Activity (Barrier Integrity Cornerstone)
- Unit 2 Reactor Coolant System Leak Rate (Barrier Integrity Cornerstone)

• Unit 3 Reactor Coolant System Leak Rate (Barrier Integrity Cornerstone)

b. <u>Findings</u>

No findings of significance were identified.

4OA5 Other - Independent Spent Fuel Storage Installation (ISFSI) Project

a. <u>Inspection Scope (60855)</u>

Exelon was actively engaged in cask reassembly on the refuel floor of the reactor building after loading of spent fuel from the spent fuel pool. The inspectors observed and evaluated the reassembly and helium leak testing of the loaded cask for compliance with the spent fuel cask loading and transport operations procedure. The inspectors reviewed selected verification points to assure that these activities were signed off as the individual steps were completed. Also, the inspectors verified that leak test acceptance criteria were clearly spelled out and that the specified acceptance levels were achieved prior to terminating the test.

The inspectors verified by the selected review of ISFSI cask surface dose rate records that loaded cask surface contamination and dose rate levels were within specified limits prior to beginning cask transport operations. The inspectors attended and evaluated the pre-job briefing of personnel directly responsible for the cask movement from the refuel floor to the storage pad location. The inspectors observed cask movement from the refuel floor to the reactor building hatch and lowering to the floor at the 135 foot level, engagement by the cask transport, and removal from the reactor building. The inspectors verified the cask movement activity was undertaken with the presence of appropriate security and radiation protection personnel and that all movement activities were made using safe work practices.

b. <u>Findings</u>

No findings of significance were identified.

4OA6 Meetings

.1 Exit Meeting Summary

The inspectors presented the results of the inspection to Mr. J. Doering, Site Vice-President, and members of Exelon's management on July 11, 2001. No proprietary information was identified.

.2 Annual Assessment Public Meeting

On June 12, 2001, NRC Region I management and staff met with Exelon management to discuss results of NRC's assessment of the safety performance at the Peach Bottom Atomic Power Station from April 1, 2000, through March 31, 2001. Slides from this meeting can be found in the Publically Available Records component of NRC's document system (ADAMS) under ascension number ML011800425. This assessment was performed under the new Reactor Oversight Process and was documented in a letter to Exelon Nuclear dated May 30, 2001.

4OA7 Licensee Identified Violations

The following findings of very low significance were identified by Exelon and are violations of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600 for being dispositioned as Non-Cited Violations (NCVs).

Tracking Number

Requirement Exelon Failed to Meet

NCV 05000278/2001-005-01 Technical Specification 5.4.1 requires written procedures be established, implemented and maintained covering activities listed in Regulatory Guide 1.33. Regulatory Guide 1.33 includes surveillance tests on emergency core cooling systems such as the high pressure coolant injection system (HPCI). In March 2001, a required stroke time for a Unit 3 HPCI system minimum flow valve was not identified as being in the alert range during surveillance testing and, therefore; it was not properly evaluated as required by the surveillance test procedure. ST-O-023-301-3. The issue is documented in Exelon's corrective action program as PEP I0012794.

NCV 05000277/2001-005-02 10 CFR 50, Appendix B, Criterion XI, "Test Control," NCV 05000278/2001-005-02 requires, in part, that written test procedures used to

demonstrate that SSCs perform satisfactorily incorporate acceptance limits contained in applicable design documents. During surveillance testing of the 'A' SBGT system per ST-O-09A-230-2 on May 29, 2001, the test procedure did not contain applicable acceptance criteria. Specifically, heater performance testing for the 'A' SBGT system was evaluated using acceptance criteria based on a heater capacity calculation that assumed a balanced three phase circuit. This was not the configuration during this test since one element of the heater circuit was bypassed. This issue is documented in Exelon's corrective action program as PEP I0012657.

If you deny these Non-Cited Violations, you should provide a response with the basis for your denial, within 30 days of the date of this inspection report, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region I; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Peach Bottom facility.

ATTACHMENT 1

SUPPLEMENTAL INFORMATION

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened/Closed

05000278/2001-005-01	NCV	Failure to Adequately Implement a High Pressure Coolant Injection Surveillance Test Procedure for a Minimum Flow Valve Stroke Time - Unit 3. (Section 4OA7)
		Test Procedure for a Minimum Flow Valve

05000277;278/2001-005-02 NCV Failure to Use Applicable Design Criteria

from Calculations in Acceptance Limits for 'A' Standby Gas Treatment Heater Capacity

Testing - Common. (Section 4OA7)

PARTIAL LIST OF PERSONS CONTACTED

Exelon Generation Company

- J. Doering, Site Vice President
- G. Johnston, Plant Manager
- P. Davison, Site Engineering Director
- J. Bouck, Senior Manager, Operations
- M. Delowery, Senior Manager-Outages
- I. Seddon, Chem/Rad Waste Manager
- H. Trimble, Radiation Protection Manager
- M. Alfonso, Training Director
- J. Heyne, Maintenance Support Manager
- A. Winter, Manager, Experience Assessment
- A. D. Dycus, Lead Assessor, Site Nuclear Oversight

LIST OF ACRONYMS

ECCS Emergency Core Cooling System
ECR Engineering Change Request
EDG Emergency Diesel Generator
ESW Emergency Service Water
HPCI High Pressure Coolant Injection
HPSW High Pressure Service Water

ISFSI Independent Spent Fuel Storage Installation

NCV Non-Cited Violation

NRC Nuclear Regulatory Commission
PARS Publicly Available Records

PEP Performance Evaluation Process

RHR Residual Heat Removal

SBGT Standby Gas Treatment System
SCBA Self-Contained Breathing Apparatus
SDP Significance Determination Process
SSC Structures Systems or Component
TPA Temporary Plant Alternations

TS Technical Specification

UFSAR Updated Final Safety Analysis Report